

Wendy Alison Nora  
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Hearing Date: August 29, 2012  
Hearing Time: 10:00 a.m.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re

Residential Capital, LLC *et al.*,

Chapter 11

. Debtors. Case No. 12-12020 (MG)  
Administratively Consolidated

-----X

**STATEMENT ON PROPOSED ORDER GRANTING DEBTORS' MOTION FOR SALE OF  
MORTGAGE LOANS AS "DEMINIMUS SALES" UNDER 11 USC SEC. 363  
[DOCKET NO. 1094]**

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Wendy Alison Nora, a contingent claimant and creditor in these proceedings, makes the following statement for the record with respect to the entry of the proposed Order granting Debtors' Motion to Authorize "DeMinimus Sales under 11 USC sec. 363.

1. According to the Motion, Debtors seek to sell "assets" valued at less than 2.5 million dollars in asset value without notice to all interested parties appearing herein and to sell "assets" valued at 2.5 to 15 million dollars in asset value with notice to additional interested parties.

2. According to the Affidavits in Support of the Motion, Debtors appear to be seeking leave to sell mortgage loans in blocks of 2.5 million dollars or less in asset value without notice to all interested parties appearing herein and to sell mortgage loans valued at 2.5 to 15 million dollars in asset value with notice to additional interested parties.

3. Debtors also seek to charge all their costs of sale to against the recovery from the so-called *de minimus* sales and state that they will pay “reasonable commissions and fees to any properly retained third-party sale agents in connection with the Limited Notice *De Minimis* Sale. To the extent necessary, the Debtors will seek Court authority to retain any brokers or liquidators to assist the Debtors in *De Minimis* Sales”

4. If the Debtors are actually seeking permission to sell mortgage loans as the Affidavits in Support of the Motion state, the undersigned has no objection to the *de minimus* sales request.

5. If the Debtors are seeking permission to sell all assets in blocks of less than 2.5 million dollars on more limited notice and assets of 2.5 to 15 million dollars in assets, including the real estate interests they have obtained through foreclosures throughout the nation, the undersigned demands that specific notice of any attempt to sell her home located at 6931 Old Sauk Road in Madison, Wisconsin so that she may seek injunctive relief against that proposed sale because the sale of her home would deprive her of her property interest in the home during the pendency of her appeal to the Wisconsin Court of Appeals.

Dated: August 23, 2012 at Minneapolis, Minnesota.

ACCESS LEGAL SERVICES

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